

EXHIBIT C - 1

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Sean K. Claggett & Associates, LLC d/b/a } Case #2:21-cv-02237-GMN-DJA
Claggett & Sykes Law Firm, et al. }
Plaintiff(s), }
vs. }
Don C. Keenan, et al. }
Defendant(s). }

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

Lindsay Mitchell Henner, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of
Troutman Pepper Hamilton Sanders LLP
(firm name)

with offices at 600 Peachtree Street, NE, Suite 3000,
(street address)

Atlanta, Georgia, 30308,
(city) (state) (zip code)

404-885-3000, lindsay.henner@troutman.com.
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by
Keenan's Kids Foundation, Inc. and David J. Hoey to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

EXHIBIT C - 2

7 4. That Petitioner was admitted to practice before the following United States District
8 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
9 of other States on the dates indicated for each, and that Petitioner is presently a member in good
10 standing of the bars of said Courts.

	Court	Date Admitted	Bar Number
11	Colorado Bar	March 12, 2021	
12	USDC, Northern District of Georgia	February 10, 2014	
13	U.S. Court of Appeals, 2nd Circuit	August 27, 2015	
14	U.S. Court of Appeals, Federal Circuit	May 23, 2017	
15	U.S. Court of Appeals, 11th Circuit	September 7, 2017	
16	U.S. Court of Appeals, 9th Circuit	May 9, 2016	
17	Supreme Court of Georgia	June 16, 2014	
18			

20 5. That there are or have been no disciplinary proceedings instituted against petitioner,
21 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
22 or administrative body, or any resignation or termination in order to avoid disciplinary or
 disbarment proceedings, except as described in detail below:

(State "none" if Petitioner has no disciplinary proceedings, etc.)

| None

EXHIBIT C - 3

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

(State "none" if Petitioner has never been denied admission.)

| None

6 7. That Petitioner is a member of good standing in the following Bar Associations.

(State "none" if Petitioner is not a member of other Bar Associations.)

Georgia Bar Association and the American Bar Association

10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

12	Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
13	<hr/>			
14	None			
15	<hr/>			
16	<hr/>			
17	<hr/>			
18	<hr/>			

(If necessary, please attach a statement of additional applications)

20 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
22 extent as a member of the State Bar of Nevada.

23 10. Petitioner agrees to comply with the standards of professional conduct required of
24 the members of the bar of this court.

25 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
26 practice in this jurisdiction and that the client has consented to such representation.

EXHIBIT C - 4

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
 2 FOR THE PURPOSES OF THIS CASE ONLY.

3
 4 STATE OF Georgia)
 5 COUNTY OF Fulton)
 6

Lindsay M. Henner
 Petitioner's signature

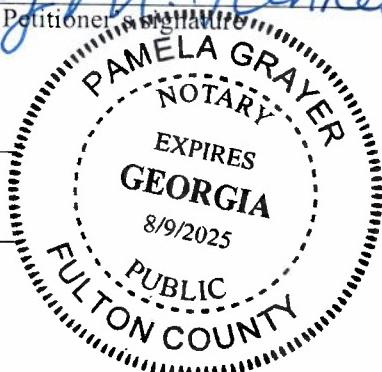
7 Lindsay Mitchell Henner, Petitioner, being first duly sworn, deposes and says:
 8 That the foregoing statements are true.

9 Subscribed and sworn to before me this
 10

11 13th day of July, 2022
 12

Pamela Grayer
 13 Notary Public or Clerk of Court

Lindsay M. Henner
 Petitioner's signature



16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
 17 THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
 19 believes it to be in the best interests of the client(s) to designate James J. Pisanelli,
 20 (name of local counsel), Attorney at Law, member of the State of Nevada and previously admitted to practice before the
 21 above-entitled Court as associate resident counsel in this action. The address and email address of
 22 said designated Nevada counsel is:

23 _____ 400 South 7th Street, Suite 300 _____,
 24 (street address)

25 _____ Las Vegas _____, _____ Nevada _____, _____ 89101 _____,
 26 (city) (state) (zip code)

27 _____ 702-214-2100 _____, _____ jjp@pisanellibice.com _____.
 28 (area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

EXHIBIT C-5

4 APPPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL

5
6 The undersigned party(ies) appoint(s) James J. Pisanelli
7 (name of local counsel) as
8 his/her/their Designated Resident Nevada Counsel in this case.

9
10 Sign Here on behalf of
11 Keenan's Kids
12 Foundation

13 (party's signature)

14 Keenan's Kids Foundation, Inc., Founder
15 (type or print party name, title)

16 (party's signature)

17 (type or print party name, title)

CONSENT OF DESIGNEE

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19
20 Designated Resident Nevada Counsel's signature

21 Bar number

Email address

22 APPROVED

23 Dated: this _____ day of _____, 20____

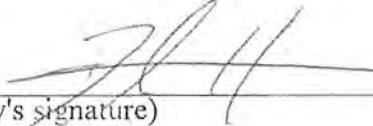
24 UNITED STATES DISTRICT JUDGE

EXHIBIT C - 6

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

7 The undersigned party(ies) appoint(s) James J. Pisanelli as
8 (name of local counsel)
his/her/their Designated Resident Nevada Counsel in this case.

9 
10 (party's signature)

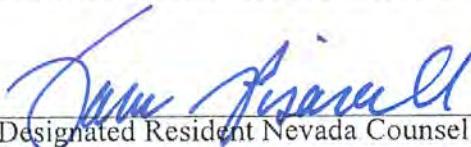
11 David J. Hoey, Individual
12 (type or print party name, title)

13 (party's signature)

15 (type or print party name, title)

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19 
20 Designated Resident Nevada Counsel's signature

21 4027 JJP@pisanellibice.com
Bar number Email address

23 APPROVED:

24 Dated: this _____ day of _____, 20 ____.

26 UNITED STATES DISTRICT JUDGE

EXHIBIT C - 7



Lawyers Serving the Public and the Justice System

Ms. Lindsay Elizabeth Mitchell Henner
Troutman Pepper Hamilton Sanders LLP
600 Peachtree Street NE Suite 3000
Atlanta, GA 30308
UNITED STATES

CURRENT STATUS: Active Member-Good Standing
DATE OF ADMISSION: 11/07/2013
BAR NUMBER: 272310
TODAY'S DATE: 07/14/2022

The prerequisites for practicing law in the State of Georgia are as follows:

- Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, arm of the Supreme Court of Georgia.

This member is currently in “good standing” as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Brinda Lovvold

Official Representative of the State Bar of Georgia

HEADQUARTERS
104 Marietta St. NW, Suite 100
Atlanta, GA 30303-2743
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Fax 404-527-8717
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Fax 912-239-9970

SOUTH GEORGIA OFFICE
244 E. 2nd St. (31794)
P.O. Box 1390
Tifton, GA 31793-1390
229-387-0446 • 800-330-0446
Fax 229-382-7435

From: Bridget Zerner
Sent: Wednesday, August 10, 2022 3:03 PM
To: 'lindsay.henner@troutman.com'
Subject: Keenan's Kids Foundation
Attachments: 15. Order Allowing Alternative Service on Keenan.pdf; 11. First Amended Complaint.pdf; 11-1. Ex A 2010 Fee Agreement.pdf; 11-2. Ex B Referral Agreement.pdf; 11-3. Ex C Hoey Emails.pdf; 11-4. Ex D 2015 Fee Agreement.pdf; 11-5. Ex E Hoey-Goganian Fee Agreement.pdf; 11-6. Ex F Sobczak Affidavit.pdf; Summons Keenans Kids Foundation.pdf

EXHIBIT C - 8

Good afternoon, Attorney Henner –

I understand you represent the Keenan's Kids Foundation. On behalf of Plaintiff Kira Wahlstrom, we have filed suit against the Foundation and write to see if you are able to accept service of the complaint. I attach the First Amended Complaint, exhibits, and summons.

We had difficulties serving Mr. Keenan and his law firm at 148 Nassau Street and obtained an order allowing alternative service which I also attach. My process server already attempted service this week of the Foundation at that same address and reported, like before, that while a light was on at the office, the door was locked, no one could be seen and no one answered the door. I seek to avoid filing another motion with the court, if possible.

Thank you for letting me know either way. Or if there is someone else I should contact, please let me know.

Bridget A. Zerner
MARKHAM READ ZERNER LLC
One Commercial Wharf West
Boston, MA 02110
Tel: (617) 523-6329
Fax: (617) 742-8604
bzerner@markhamreadzerner.com

www.markhamreadzerner.com

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